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COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and environment of the people of Colorado

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Patricia A. Nolan, MD, MPH Executive Director

April 9, 1993

Mr. Martin Hestmark U.S. Environmental Protection Agency Region VIII 999 18th Street, Suite 500, 8WM-C Denver, Colorado 80202-2405

RE: Technical Memorandum (TM) 4 - Surface Soil Sampling Plan for the Ash Pits Area: Operable Unit 5, March, 1993

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document prepared by DOE and prime operating contractor, EG&G. recommend that this TM be given conditional approval subject to the comments included below.

The Division's comments to this TM are as follows:

- Section 3.1: DOE needs to clarify why no biased sample is planned downwind from the suspected ash pile area. If this was an ash pile, it seems that wind dispersion of the piled material is more likely than dispersion downwind of material from the ash pits. A sample here seems reasonable.
- 2) Section 3.1: The Division believes that the biased samples being collected downwind from the pits should be located on HPGe grid nodes in a manner similar to the random samples.
- Section 3.2: More information on the sample collection method is necessary than what is currently included in this section. How will the Rocky Flats Plant method be employed; will compositing techniques be used; if so, how? Consistency with previously approved surface soil sampling methodologies in this and other OUs should be achieved (TM5 for OU1, TM10 for OU5).
- Section 3.3: Given the fact that an old incinerator is included in this investigation, the Division requests that PAHs be added to the analytical suite.

If you have any questions, please call Joe Schieffelin of my staff at 692-3356.

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Sincerely,

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Gary W. Baughman, Chief

Facilities Section

Hazardous Waste Control Program

cc: Richard Schassburger, DOE Jen Pepe, DOE Ed Mast, EG&G

Jackie Berardini, CDH-OE